

This proposal will clearly harm the small educational noncommercial stations who are laboring to stay viable in a climate of rising costs and diminishing revenues from traditional sources of government support. Unlike public stations in the Washington, D.C. area, small market stations have reached the saturation point for private funding.

WMOT is staffed by seven professionals. We are stretched to the limit with current daily operational details and regulatory requirements. The proposed rules changes will further dilute our ability to concentrate on serving our communities with outstanding and relevant programming, as we attend to the daily recording and management of records associated with the proposed requirements.

While I agree that some in the industry have lost sight of their public service duties and allowed materials of poor taste to be broadcast, the rest of the industry should not be burdened for their discretions. Further, the proposal is, I firmly believe, is an abdication of the Commission's responsibility by shifting burden of enforcement to stations.

Small market noncommercial stations face many of the same problems as our commercial colleagues. The above account of issues facing noncommercial stations mirror the small market commercial operators. Both groups are faced with an uphill battle to maintain localism on the airwaves as we face the trend toward large groups gobbling up stations. These proposed rules changes would only exacerbate our efforts.

Respectfully for your review.

John L. High, Director of Broadcasting  
Middle Tennessee State University  
Murfreesboro, TN 37132